



WESTERN AGRICULTURAL PROCESSORS
ASSOCIATION

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Michelle Ramirez
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-12B
Sacramento, CA 95812-4010

Re: Hazard Identification Materials for Chlorpyrifos

To Whom It May Concern:

The Western Agricultural Processors Association (WAPA) appreciates the opportunity to comment on the Office of Environmental Health Hazard Assessment's (OEHHA) "Hazard Identification Materials for Chlorpyrifos".

WAPA represents huller/shellers and processors of almonds, walnuts, pistachios and pecans in California on regulatory and legislative issues that affect the tree industry such as pesticides, safety, water, labor, and air quality issues.

California tree nut growers of almonds, walnuts and pecans rely heavily on the availability of Chlorpyrifos. The product is a necessary tool to control pests including the twig borer, navel orange worm, codling moth, mites, along with many more. Chlorpyrifos is a broad spectrum insect control, which offers growers not only an efficient but a cost effective tool as well. A single application of chlorpyrifos could be used in place of applying multiple applications targeting different pests. As more products are being regulated out of use faster than products introduced, growers are faced with pest resistance management. Insects are becoming increasingly resistant to applications as fewer tools are available to use with alternate modes of action. Chlorpyrifos is a critical tool that must be available for growers to use.

Chlorpyrifos' potential listing under Prop 65 would create a significant impact on grower's ability to use this important tool. Our Association stands by the research and sound scientific work that upholds the product's current federal label.

WAPA and OEHHA share the same goal of taking every necessary effort to protect human health and the environment. However, our Association feels that the listing of chlorpyrifos under Prop 65 would be a precedent setting move that is not based on the sound, scientific data that is accepted today. We ask that OEHHA take into consideration the damage that would be done to the integrated pest management system in place today if additional restrictions were to be imposed. We appreciate the opportunity to comment on this matter.

Sincerely,

Jodi Raley
Director of Regulatory Affairs